

1 BRUCE M. COHEN (SBN 084318)  
2 [bcohen@bmcaw.com](mailto:bcohen@bmcaw.com)  
3 JULIA MACHAI COHEN (SBN 252417)  
4 [jvmcohen@bmcaw.com](mailto:jvmcohen@bmcaw.com)  
5 BMCA LAW GROUP, A P.C.  
11693 San Vicente Blvd., Suite 804  
Los Angeles, CA 90049  
Telephone: (424) 287-5400  
Facsimile: (424) 287-5401

6 Attorneys for Plaintiff  
DEBRA COHEN TUDOR

7 STEPHEN M. HAYES (SBN 83583)  
8 [shayes@hayesscott.com](mailto:shayes@hayesscott.com)  
9 STEPHEN P. ELLINGSON (SBN 136505)  
10 [sellingson@hayesscott.com](mailto:sellingson@hayesscott.com)  
11 JAMIE A. RADACK (SBN 221000)  
12 [jradack@hayesscott.com](mailto:jradack@hayesscott.com)  
13 HAYES SCOTT BONINO  
ELLINGSON & GUSLANI LLP  
333 Twin Dolphin Drive, Suite 230  
Redwood City, CA 94065  
Telephone: (650) 637-9100  
Facsimile: (650) 637-9101

14 Attorneys for Defendant  
STATE FARM GENERAL INSURANCE COMPANY

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA

18 DEBRA COHEN TUDOR,

19 Plaintiff,

20 vs.

21 STATE FARM GENERAL INSURANCE  
22 COMPANY, an Illinois corporation; and  
DOES 1 through 50, inclusive,

23 Defendants.  
24

CASE NO. 3:22-cv-01113-RFL

**STIPULATION AND [PROPOSED] ORDER  
TO MODIFY THE SCHEDULING ORDER**

25 Plaintiff Debra Cohen Tudor and defendant State Farm General Insurance Company (the  
26 “Parties”) submit the following stipulation to revise the court’s scheduling order.  
27  
28

**RECITALS**

1. WHEREAS, fact discovery in this matter is currently scheduled to close on October 13, 2025, with trial set for April 13, 2026;
2. WHEREAS, to date there has been no protective order in place in this matter; Ms. Tudor and State Farm General Insurance Company (“State Farm”) have negotiated extensively for several months over the terms of a protective order but have not reached agreement;
3. WHEREAS, discovery related to information that would be subject to the protective order has not proceeded for the last few months because of the inability of the parties to agree on a protective order. This discovery includes institutional documents that State Farm considers proprietary and confidential and multiple related 30(b)(6) depositions. The protective order dispute is now before Judge Kang (Dkt. No. 55).
4. WHEREAS, in July 2025 the Court granted the parties’ stipulation and proposed order to partially modify the Scheduling Order based in part on medical issues preventing two State Farm witnesses from attending a deposition (Dkt. No. 54.) State Farm advises that one of those witnesses has recovered sufficiently to attend a deposition and that the other remains under ongoing medical treatment that will prevent him from attending a deposition until at least December 2025.
5. WHEREAS, the parties agree that the Court’s scheduling Order needs to be adjusted. The proposed dates below reflect a months-long acknowledgment between the parties that the duration of the protective order negotiations and dispute shall not impair either party’s discovery opportunities.
6. WHEREAS, the Court graciously agreed to modify the Scheduling Order on January 24, 2023 (Dkt. No. 25), on August 22, 2023 (Dkt. No. 27), on May 15, 2024 (Dkt. No. 35), on April 1, 2025 (Dkt. No. 48, at which time the Court stated that it did not anticipate granting any further extensions absent extraordinary circumstances), on July 2, 2025 (Dkt. No. 51), and on July 25, 2025 (Dkt. No. 54). The Parties respectfully submit that the instant request reflects extraordinary circumstances and good cause for adjusting the schedule further at this time.

## II. STIPULATION

The Parties hereby stipulate to the following revisions to the court's Scheduling Order:

- |    |                            |   |
|----|----------------------------|---|
| 1. | Fact discovery cutoff:     | February 24, 2026<br>(currently October 13, 2025) |
| 2. | Initial Expert Reports:    | March 11, 2026<br>(currently October 29, 2025)    |
| 3. | Rebuttal Expert Reports:   | April 3, 2026<br>(currently November 21, 2025)    |
| 4. | Dispositive Motions due:   | April 24, 2026<br>(currently December 12, 2025)   |
| 5. | Close of Expert Discovery: | May 29, 2026<br>(currently January 16, 2026)      |
| 6. | Dispositive Motion Hearing | June 2, 2026<br>(currently January 20, 2026)      |
| 7. | Pretrial Conference        | July 28, 2026<br>(currently March 17, 2026)       |
| 8. | Jury Selection/Jury Trial  | August 24, 2026<br>(currently April 31, 2026)     |

Dated: October 10, 2025

BMCA LAW GROUP, A P.C.

By /S/ Bruce M. Cohen

BRUCE M. COHEN  
JULIA MACHAI COHEN  
Attorneys for Plaintiff  
DEBRA COHEN TUDOR

Dated: October 10, 2025

HAYES SCOTT BONINO  
ELLINGSON & GUSLANI LLP

By /S/ Stephen P. Ellingson

STEPHEN M. HAYES  
STEPHEN P. ELLINGSON  
JAMIE A. RADACK  
Attorneys for Defendant  
STATE FARM GENERAL INSURANCE COMPANY

**[PROPOSED] ORDER**

IT IS SO ORDERED.

Pursuant to the Parties' stipulation, the Scheduling Order is modified as follows:

1. Fact discovery cutoff: February 24, 2026  
(currently October 13, 2025)
2. Initial Expert Reports: March 11, 2026  
(currently October 29, 2025)
3. Rebuttal Expert Reports: April 3, 2026  
(currently November 21, 2025)
4. Dispositive Motions due April 24, 2026  
(currently December 12, 2025)
5. Close of Expert Discovery: May 29, 2026  
(currently January 16, 2026)
6. Dispositive Motion Hearing June 2, 2026  
(currently January 20, 2026)
7. Pretrial Conference July 28, 2026  
(currently March 17, 2026)
8. Jury Selection/Jury Trial August 24, 2026  
(currently April 31, 2026)

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
HONORABLE RITA F. LIN  
UNITED STATES DISTRICT COURT JUDGE  
FOR THE NORTHERN DISTRICT OF  
CALIFORNIA